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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF THE COMPLAINT OF

HAPAG-LLOYD AKTIENGESELLSCHAFT
a/k/a HAPAG-LLOYD AG

AS OWNERS AND OPERATORS OF THE
M/V YANTIAN EXPRESS

IN ADMIRALTY

19-cv- 5731 (GHW)

STIPULATION FOR COSTS

WHEREAS, Plaintiff has instituted or will be instituting proceedings in this Court, pursuant to 46 U.S.C. §§ 30505 & 30511, for exoneration from or limitation of liability with respect to all claims, loss, damage or liability arising out of or relating to a fire that occurred on or about January 3, 2019, during a voyage of the M/V YANTIAN EXPRESS (the “Vessel”) and the subsequent firefight and salvage efforts, the facts of which are more particularly set forth in the accompanying Complaint, or for any other matter arising during the voyage on which the Vessel was then engaged, in which proceedings Plaintiff prays, among other things, that the Court issue a notice to all persons asserting claims with respect to the matters for which the Complaint has been filed, notifying them to file their respective claims with the Clerk of this Court and to serve on Plaintiff’s attorneys a copy thereof, and that an injunction issue restraining commencement and further prosecution of all claims, suits, actions and proceedings against Plaintiff, the Vessel, and/or either of their agents, representatives or insurers, with respect to the

matters in question, except in accordance with the provisions of the notice to be issued herein;
and

WHEREAS, Plaintiff wishes to provide security for costs as provided for in Supplemental Admiralty Rule F(1) of the Federal Rules of Civil Procedure;

NOW THEREFORE, it is hereby stipulated and agreed, for the benefit of whom it may concern, that The Britannia Steam Ship Insurance Association Limited ("Britannia") by its agent Tindall Riley (Britannia) Limited, Regis House, 45 King William Street, London EC4R 9AN, United Kingdom, undertakes to pay into the registry of the Court within ten (10) days after entry of an order to do so, the sum of \$500.00 as security for all costs and expenses which may be awarded against Plaintiff herein by the final decree of this Court, or upon appeal by an appellate court, if any appeal; and pending the payment into the Court of such sum, this Stipulation for Costs shall stand as security for costs as provided for in Supplemental Admiralty Rule F(1).

The signing of this stipulation by JONATHAN BOTT shall not be construed as binding on him personally or binding on Tindall Riley (Britannia) Limited, but is to be binding only upon Britannia.

Dated: New York, New York
June 17, 2019

The Britannia Steam Ship Insurance Association Limited

By: Tindall Riley (Britannia) Limited

Name:

Title:

JONATHAN BOTT
DIRECTOR (CLAIMS)